

Policy for Toxicity Assessment and Control

Public Hearing, August 21, 2012

Project Background

- Numeric chronic toxicity limits were included in permits for the Los Coyotes and Long Beach WRPs
- The L.A. County Sanitation District petitioned the State Water Board to remove the limits
- The Board declined to make a determination (WQO 2003-0012)
- Resolution 2005-0019 requires revisions to the toxicity provisions in the SIP

Policy Goals

- Protect aquatic life beneficial uses
- Comply with Resolution 2005-0019
- Provide a clear and consistent method to interpret data
- Establish a uniform approach to toxicity control across program areas
- Provide for an efficient regulatory program

Draft Policy Provisions

- Numeric objectives for chronic and acute toxicity
- Reasonable potential analysis / test species screening
- Chronic and acute toxicity limits
- Accelerated monitoring and TRE implementation
- Exceptions for specific discharger categories

Accomplishments

- Made substantial revisions to the draft Policy
- Supplemented Test Drive Analysis
- Completed external peer review
- Released draft Policy for third public comment period

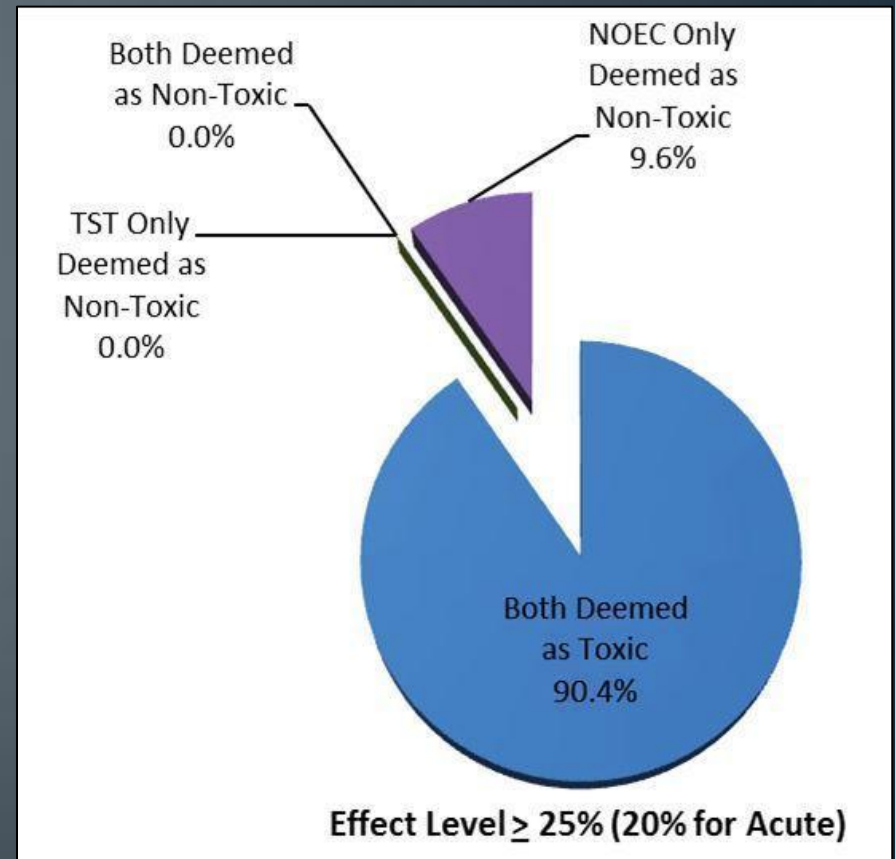
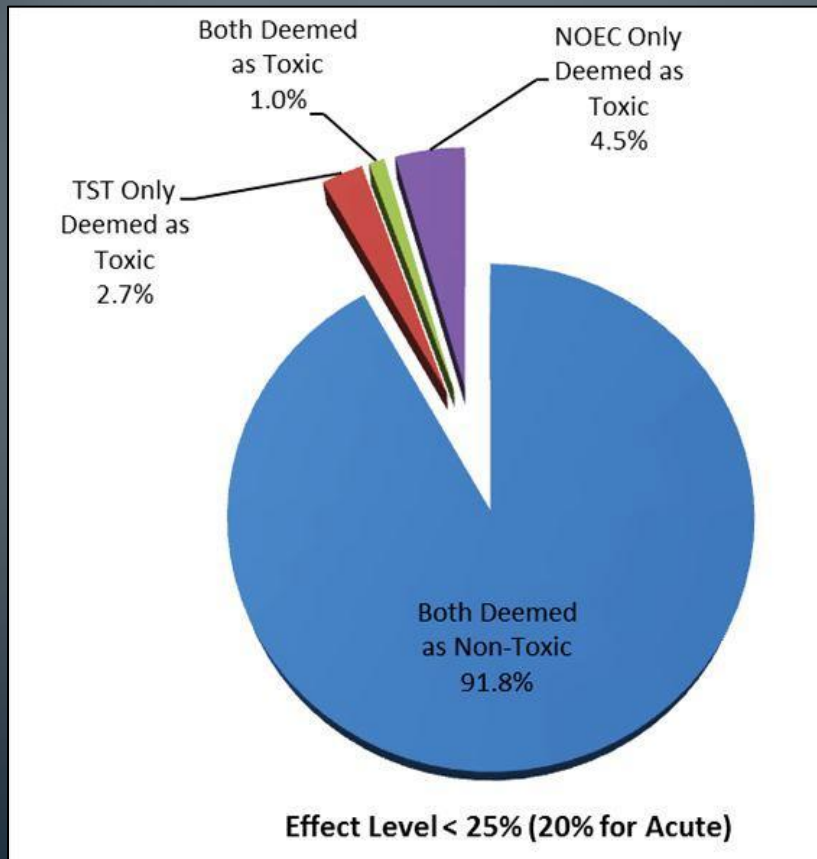
Policy Revisions

- Revised maximum daily effluent limitations
- Added median monthly effluent limitations
- Shortened accelerated monitoring schedule
- Reduced provisions for storm water and channelized dischargers
- Included exceptions for small, disadvantaged communities
- Removed TRE Work Plan requirements

TST Test Drive

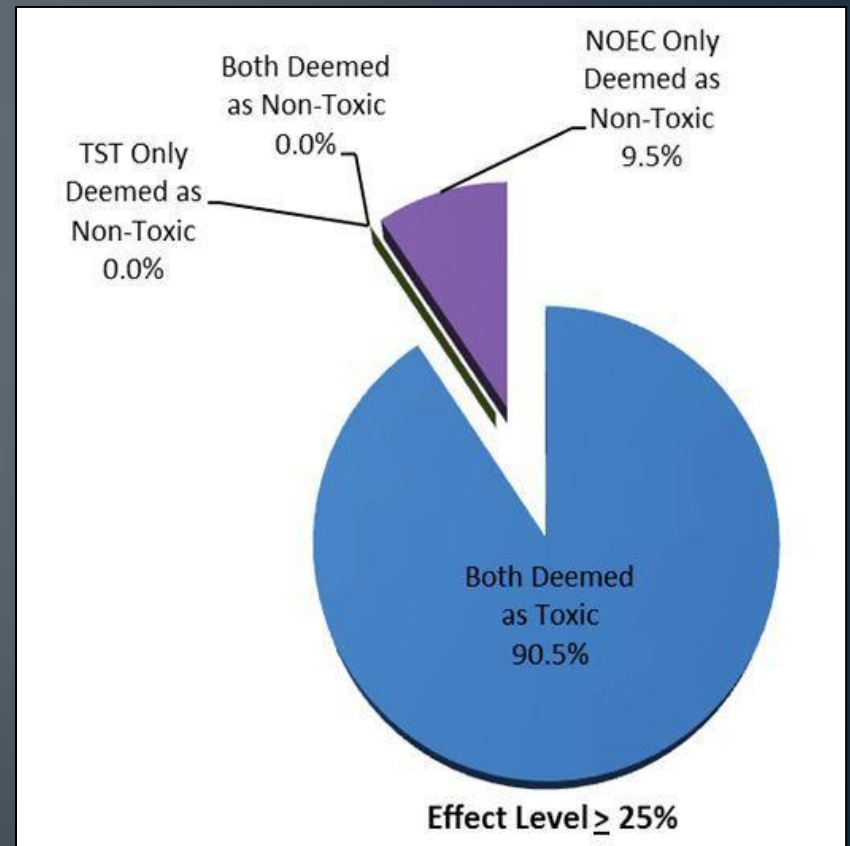
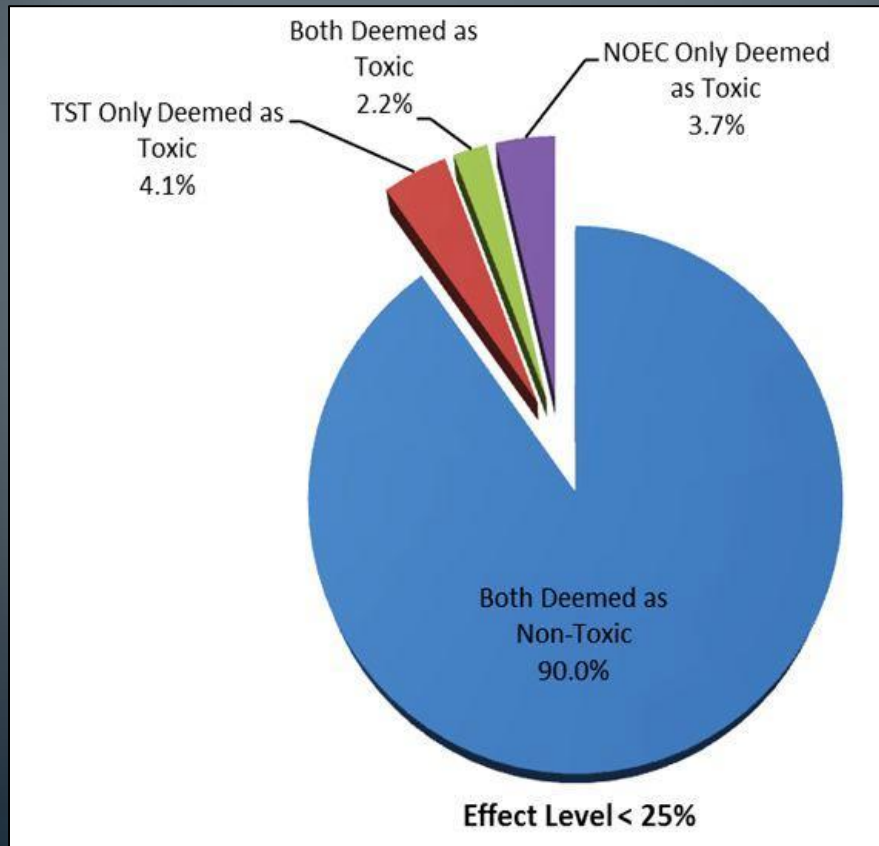
Results of effluent chronic toxicity endpoint analysis

n = 890



TST Test Drive

Results of storm water and ambient chronic toxicity endpoint analysis
n = 3,201



Peer Review

“The draft policy is based on sound science, methods and practices. It is a substantial improvement relative to current methods. The State Water Board should be proud of this advance and, hopefully, it will serve as an example for other regulatory groups desiring to move beyond the NOEC.”

~ Dr. Michael C. Newman

“The draft policy follows closely US EPA guidelines and no significant scientific concerns are noted. This reviewer is satisfied that the guideline will prove effective in the sagacious monitoring of wastewater for toxicity.”

~ Dr. Gerald A. LeBlanc

Revised Economic Study

Extrapolation of Compliance Costs

Discharger Category	Total Cost to Sample Dischargers	Number of Sample Dischargers	Average Cost per Discharger	Number of Dischargers Statewide	Total Statewide Cost
Certainty Sample ²	-\$71,500	2	NA	2	-\$71,500
Municipal Wastewater	-\$53,800 to -\$9,600	5	-\$10,800 to -\$1,900	125	-\$1,350,000 to -\$237,500
Chemicals and Allied Products	-\$7,300	1	-\$7,300	1	-\$7,300
Metals Manufacturing and Finishers	-\$7,400 to \$7,900	1	-\$7,400 to \$7,900	1	-\$7,400 to \$7,900
Petroleum Refineries	-\$45,900 to -\$30,500	2	-\$23,000 to -\$15,300	9	-\$207,000 to -\$137,700
Pulp and Paper	-\$5,500	1	-\$5,500	1	-\$5,500
Other Industrial	\$2,800 to \$17,400	2	\$1,400 to \$8,700	27	\$37,800 to \$234,900
Total	NA	14	NA	166	-\$1,610,900 to -\$216,700

TST Implementation

- NPDES Permit for Orange County Sanitation District Reclamation Plant No. 1 and Treatment Plant No. 2 (Order RS-2012-0035)
- Draft 2012 Caltrans General Permit for Storm Water Discharges
- Other states are considering implementation of the TST

Questions?